

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ROBERT MARLEY CHAPAS and ISIAH
PERRY,

Defendants.

Case No.: 3:22-mj-00226-KFR

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Seth P McMillan, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. This affidavit is submitted in support of a criminal complaint against ROBERT MARLEY CHAPAS and ISIAH PERRY for violating 18 U.S.C. § 2113(a) – Bank Robbery.
2. I am familiar with the information contained in this affidavit based upon the investigation I have conducted, in conjunction with other federal, state, and local law enforcement officials, which has included exchanging information with law enforcement officers and others; reviewing video surveillance, reports, database records and other information acquired during this investigation; and reviewing evidence obtained therefrom; and interviewing witnesses.
3. Because I submit this affidavit for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me or the government. I have only included those facts necessary to establish probable cause to believe that ROBERT MARLEY CHAPAS and ISIAH PERRY have committed a violation of 18 U.S.C. § 2113(a).

4. I am an Anchorage Police Officer with the Anchorage Police Department and have been since November 2003. I previously was a Knoxville Police Department officer from 2000-2003. My current assignment is as a Federal Task Force Officer with the FBI Safe Streets Violent Crime Squad. During this time, I have been assigned duties in Patrol, Training, SWAT/Special Assignment Unit, Investigations and FBI Safe Streets Task Force. During my career as a Police Officer, I have been involved in numerous investigations of robberies, burglaries, thefts, fraud, homicides, felony and misdemeanor assaults, sex offenses, vehicle collisions, narcotics and other misdemeanor and felony crimes. These investigations have included applications for, and the receipt and execution of, numerous search warrants for the seizure of evidence pertinent to the investigation. In addition to my formal education, I have completed thousands of hours of training covering a variety of law enforcement related topics, including but not limited to: Licensed Mobile Intensive Care Paramedic, Hazardous Materials Technician, Crisis Negotiator, Field Training Officer, Immediate Action Rapid Deployment – Active Shooter Instructor, Hostage Rescue, Kinetic Energy Projectiles, Noise Flash Diversionary Devices, Methods of Instruction, Vehicle Pinning and Mobile Surveillance, Covert Search Techniques, Defensive Tactics Instructor, Introduction to Clandestine Laboratory Investigations, High Risk Patrol Search Tactics, Reid Basic/Advanced Interview & Interrogation, Informant Development, Drug Enforcement Administration 80-hour Basic Drug Enforcement Course, State of Alaska Crime Laboratory Drugs in Alaska class, Glock Armorer, H&K Armorer, Sig Sauer Armorer, Remington Armorer, ARWEN Armorer, Firearms Instructor, USAFSOS Dynamics of International Terrorism Course, Advanced Roadside Impaired Driving Enforcement course, Pen-Link forensic data intercept course, Officer Survival Instructor, Cellular Analysis Surveillance Team (CAST) course, Commercial Vehicle

Interdiction course, US Marshal Service High Risk Fugitive Apprehension course, Investigating Drug Trafficking Organizations course, Alaska Police Standards Council Instructor (APSC), APSC Advanced Police Officer Certificate and I have also been recognized in Anchorage Superior Court and United States District Court, District of Alaska, as an expert on drug distribution, identification and trafficking.

PROBABLE CAUSE

5. Wells Fargo Bank, N.A., is an institution whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC).
6. On April 27, 2022, at approximately 2:10 p.m., the Wells Fargo Bank branch located at 1351 Huffman Road, Anchorage, Alaska was robbed by one masked subject later identified as ROBERT CHAPAS, who passed a note threatening the use of a firearm. The subject stole \$2,450 in cash.
7. At approximately 2:10 p.m. CHAPAS entered the south entrance of the bank. The subject appeared on video surveillance from the bank as a white male, approximately 5'10", thin build, wearing a black winter hat, black surgical mask over his face, black zip up jacket, dark high-top shoes with white soles, and black heavy rubber gloves.
8. CHAPAS went to the teller window and passed a note stating "THIS IS A Robbery, I HAVE A GUN. EMPTY Your DRAWER & LET ME LEAVE LIKE A NORMAL TRANSACTION. I AM NOT ALONE, THERE ARE OTHER PEOPLE WITH ME. DO NOT TRY TO BE A HERO & GET SOMEONE HURT. DO NOT CALL POLICE OR ALERT ANYONE! UNTIL I LEAVE THE BUILDING OR I WILL SHOOT, THIS CAN BE EASY YOUR CHOICE"

9. The teller placed \$2,450 cash in CHAPAS' hands, CHAPAS said "thank you" and left the bank.

10. Directly after CHAPAS fled the Wells Fargo, a responding Anchorage Police Department (APD) officer in the area saw CHAPAS running from the direction of the bank towards Brandon Street, about 80 yards from the bank. That officer lost sight of CHAPAS. Within 3-4 minutes, four citizen witnesses contacted responding APD patrol officers. All four witnesses were in the 12500 block of Brandon Road, which is about 350 yards south of the bank, and provided similar accounts of CHAPAS running south up the street holding a "football sized" wad of currency, wearing the clothing observed on the Wells Fargo security cameras. Near a utility box next to 12541 Brandon Street, CHAPAS met with an early 20's black male with long hair, wearing a light colored hooded sweatshirt, and light colored denim jeans. The black male was later identified as ISIAH PERRY. CHAPAS stripped off the hat, jacket, surgical mask and gloves, leaving them on the ground. CHAPAS dropped eleven \$5 bills and one \$1 while doing so. CHAPAS and PERRY briefly interacted, with PERRY appearing to "shove something" into the pocket of his hooded sweatshirt. CHAPAS and PERRY separated, with CHAPAS getting on a bike that had been leaned against the utility box and leaving the area southbound, and PERRY walking northwest into a wooded area. Three of the witnesses stayed in the area of the discarded clothing and money and directed law enforcement to those items for recovery, while the fourth witness followed CHAPAS. The witness following CHAPAS continued to do so, observing CHAPAS meet back up with PERRY at the intersection of Brandon Street and Old Seward Highway, where PERRY was now riding a bike. The witness reported both CHAPAS and PERRY continuing southbound

along the Old Seward Highway until observing them both enter 13496 Old Seward Highway, apartment 106.

11. Around 5:00pm APD officers contacted CHAPAS as the sole occupant of apartment 106.

12. Around 5:30pm I applied for and was granted State of Alaska search warrant 3AN-1703-SW to search apartment 106. Seized and/or documented evidentiary items from the apartment included: a stationary pad and pen that matched the stationary the robbery note was written on, with a unique water stain on the top paper on the pad, that matched a stain on the note; high top dark colored shoes with white soles, matching the shoes seen worn by CHAPAS in the Wells Fargo surveillance footage; exactly \$1000 in US currency – 50 \$100 bills and 25 \$20 bills; numerous documents with the name ISIAH PERRY.

13. I mirandized and attempted to interview CHAPAS after his arrest by APD officers and prior to placing him in the custody of Department of Corrections. Prior to attempting the interview, I described some of the known evidence to CHAPAS, including telling him that I was aware of “ISIAH PERRY”, using PERRY’s full name.

14. On April 28, 2022, investigators were monitoring recorded inmate phone calls via the Securus system. A phone call placed using CHAPAS’ uniquely assigned calling code contained conversation with an unknown female. During this call, the female asked CHAPAS if “they caught him yet”. CHAPAS responded by saying he didn’t know for sure, but thought that “they” had and that “they” [corrections or law enforcement] were keeping them separated [in the jail]. When the female asked how CHAPAS knew, he said because “the feds told me

his full name”, then said that name “ISIAH” later in the same call while referencing the other person.

15. On April 28, 2022, investigators produced a photo lineup that contained a Dept of Motor Vehicles photo of ISIAH PERRY. That was shown to the four citizen witnesses described in Paragraph 10 of this affidavit. Three of the citizen witnesses could not pick anyone out of the lineup. One citizen witness picked PERRY with “complete certainty”.


16. On April 29, 2022, KASEY LANG was arrested by FBI Anchorage as a suspect in a string of four bank robberies that started on April 26, 2022 and ended with his apprehension on the morning of April 29. LANG was Mirandized and waived his right to remain silent, providing a full confession for all robberies. One of his robberies occurred two minutes apart from the aforementioned Wells Fargo robbery, and was questioned about his knowledge or connection with PERRY or CHAPAS. LANG confirmed that he knew PERRY and CHAPAS from having sold drugs to them in the past, and in fact had run into them on the street on the morning of April 27, 2022, the date of the Wells Fargo robbery. LANG told PERRY and CHAPAS that he had been robbing banks and intended to continue doing so. According to LANG, both PERRY and CHAPAS were eager to join his “crew” and asked repeatedly to be part of his future robberies. LANG said that he told them he “worked alone”, and did not tell them of his future intended targets or a timeline, but PERRY and CHAPAS both indicated that they intended to try a bank robbery themselves, with or without LANG.

CONCLUSION

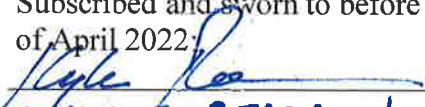
19. Based upon the information above, your affiant submits that there is probable cause to believe that ROBERT MARLEY CHAPAS and ISIAH PERRY took, by intimidation via the

threatened use of force money belonging to, or under the care, custody, and control of, Wells Fargo Bank branch located at 1351 Huffman Road in Anchorage, Alaska, whose deposits were then insured by the Federal Deposit Insurance Corporation, in violation of 18 U.S.C. § 2113(a) - Bank Robbery.

Respectfully submitted,

s/ Seth P McMillan 
Seth P McMillan
FBI Task Force Officer
Federal Bureau of Investigation

Subscribed and sworn to before me this 29th day
of April 2022.


KYLE F. BEARDON
United States Magistrate Judge
District of Alaska
Anchorage, Alaska